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December 20, 2024

VIA ECF

Honorable Colleen McMahon
United States District Judge
United States District Court, SDNY
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Re: JobPath Partners, LLC v. City of New York, Betis Direct, LLC, and CDW
Government LLC
Case No. 1:24-cv-09026-CM

Dear Judge McMahon:

We are Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to the defense of the above matter on behalf of Defendant the City of New York (the "City"). Plaintiff JobPath Partners, LLC ("JobPath"), has brought this action seeking damages for alleged breach of contract and claims of unauthorized use of computer systems.

Defendant City respectfully requests a thirty-day enlargement of time, from December 31, 2024 until January 30, 2025, for this Office to respond to the Complaint. We also request a sixty-day enlargement of time, from December 26, 2024 until February 24, 2025, for the parties to confer and submit a proposed Civil Case Management Form to the Court, and to adjourn the initial conference from February 6, 2025 to February 27, 2025, or the next date thereafter convenient to the Court. No previous requests for enlargements of time have been made by the City in this case. Plaintiff JobPath consents to this request, and a proposed order is annexed hereto.

We seek an enlargement of time to respond to the Complaint in this matter in order to investigate the allegations of the Complaint, in accordance with this Office's obligations under Rule 11 of the Federal Rules of Civil Procedure. We assure the Court that we are attempting to move forward with this litigation as expeditiously as possible, and that the requested enlargement is necessary in order for us to proceed effectively. Additionally, the City was unaware of the Court's November 26, 2024 Order Scheduling an Initial Pre-Trial Conference until after the City

was served with the Complaint on December 10, 2024, and the undersigned located the Order on PACER. Additionally, a Supplemental Summons was issued on December 18, 2024 for Co-Defendant Betis Direct, LLC, and we will need to confer with all parties to submit a Civil Case Management Plan. Accordingly, we would respectfully ask that the Court grant our request (1) for a thirty-day enlargement of the City's time to respond to the Complaint, until January 30, 2025, (2) a sixty day enlargement, until February 24, 2025, of the parties' time to submit a proposed Civil Case Management Plan, and (3) to adjourn the initial conference in this matter to February 27, 2025 or the next date thereafter convenient to the Court.

We thank the Court for its time and consideration in this matter.

Respectfully Submitted,



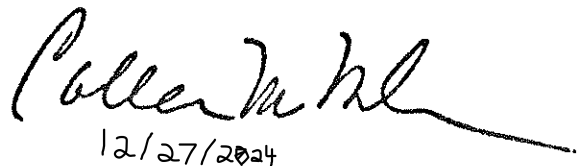
Amanda Papandrea
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cc: Elliot D. Ostrove, Esq. (Via ECF)
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Betis Direct, LLC (Via First Class Mail)
Defendant
7 Strawberry St., Suite 200
Cape Charles, VA 23310

CDW-Government LLC (Via First Class Mail)
Defendant
230 N. Milwaukee Ave.
Vernon Hills, IL 60061

The parties' requests are granted. The initial conference is adjourned to February 27, 2025 at 11 am.


12/27/2024